

IN THE UNITED STATES BANKRUPTCY COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

In Re:)	
)	BANKR. NO. 20-21579-GLT
RONALD P. ORAVEC and GURETTA G.)	
ORAVEC,)	
)	CHAPTER 13
Debtors.)	
_____)	
)	
RONALD P. ORAVEC and GURETTA G.)	
ORAVEC,)	
)	
Movant/Debtor,)	
)	
vs.)	
)	
HOME LOAN INVESTMENT BANK,)	
FSB, as Assignee of OCEAN BANK, FSB,)	
)	
Respondent/Creditor.)	

MOTION TO ENFORCE LOSS MITIGATION ORDER

AND NOW, come Movants Ronald P. Oravec and Guretta G. Oravec (“Debtors”), and file the within Motion to Enforce Loss Mitigation Order against Respondent Home Loan Investment Bank, FSB as assignee of Ocean Bank, FSB (“Creditor”), averring as follows:

1. Pursuant to 28 USCA § 1334, this Court has jurisdiction over the within matter, which is a core proceeding within the meaning of 28 USCA §157(b)(2)(G).
2. Per F.R.B.P. 7008, Debtors consent to entry of a final order of court by the Bankruptcy Judge.
3. Debtors filed their motion to enforce loss mitigation order on November 21, 2020, averring that Creditor was not compliant with the loss mitigation order.
4. Creditor reopened the portal file on December 7, 2020 and communicated that documents are complete.
5. Debtors’ counsel and Creditor’s counsel agreed that Debtor will withdraw the motion to enforce without prejudice and afford Creditor an opportunity to comply with the loss mitigation order.

WHEREFORE, Debtors respectfully request that the Court issue an order denying the motion to enforce as withdrawn without prejudice.

Dated: December 8, 2020

/s/ Glenn R. Bartifay, Esquire
GLENN R. BARTIFAY, ESQUIRE
Pa. Id. No. 68763
Attorney for Movants/Debtors

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Declaration Under Penalty of Perjury by Individual Debtors

We declare under penalty of perjury that we have read the within pleading, and that it is true and correct to the best of our knowledge, information, and belief.

Dated: December 8, 2020

Signature: /s/ Ronald P. Oravec
RONALD P. ORAVEC,
Movant/Debtor

Dated: December 8, 2020

Signature: /s/ Guretta G. Oravec
GURETTA G. ORAVEC,
Movant/Debtor